

## 6905 N. Wickham Road Suite 303 Melbourne, FL 32940

January 20, 2011

## Via ECFS

Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, SW Washington, DC 20554

Re: Written ex parte presentation

Conexions, LLC dba Conexion Wireless

Petition for Designation as a Limited-Purpose ETC (WC Docket No. 09-197)

Dear Ms. Dortch:

Conexions, LLC dba Conexion Wireless ("Conexion") submits the following information in response to inquiries from the staff regarding its pending application for designation as an eligible telecommunications carrier ("ETC") for the limited purpose of participating in the low-income universal service program.

<u>Use of Own Facilities</u>. The attached diagram illustrates how Conexion will use its own facilities to provide two of the supported services, operator services and directory assistance. Conexion will use its own voice switch and call center to provide these services. As the diagram shows, all calls of types designated by Conexion will be routed from the underlying Verizon Wireless network to Conexion's voice switch located in Melbourne, Florida, over leased PRI lines. From there, Conexion will route the calls to its call center, located in Rockledge, Florida, where it provides directory assistance and operator services. Transmission between Conexion's switch and Conexion's call center is over wireless facilities owned by Conexion.<sup>2</sup>

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<sup>&</sup>lt;sup>1</sup> Conexions, LLC d/b/a Conexion Wireless, Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, New Hampshire, North Carolina, New York, Tennessee, the Commonwealth of Virginia, and the District of Columbia, WC Docket No. 09-197 (filed Oct. 7, 2009) ("Petition"). See also Letter from Brian Cox, President, Conexions, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 09-197 (filed Nov. 24, 2009) (responding to staff inquiries regarding petition); Comment Sought on Conexions LLC d/b/a Conexion Wireless Petition for Limited Designation as an Eligible Telecommunications Carrier in Several States, WC Docket No. 09-197, Public Notice, 24 FCC Rcd 13509 (2009).

<sup>&</sup>lt;sup>2</sup> The facilities are unlicensed wireless connections operated under 47 C.F.R. Part 15, Subpart E.



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Because Conexion owns a voice switch, Conexion has the capability to provide additional supported services, such as access to interexchange services.<sup>3</sup> Conexion may in the future use its voice switch to provide its customers with interexchange services rather than reselling Verizon Wireless's interexchange service.

<u>State ETC Petitions</u>. The staff requested that Conexion clarify the status of any ETC petitions that it may have pending before state commissions. Conexion currently has one ETC petition pending before a state commission, in Arkansas. The petition was filed on December 17, 2010. In the Arkansas petition, Conexion did not make any additional commitments beyond those necessary to satisfy the criteria for designation as an ETC that are codified in the FCC's rules.

Conexion's petition complies with all relevant requirements, and is consistent with the recent grant of facilities-based low-income ETC status to Virgin Mobile.<sup>4</sup> Conexion urges the Commission to grant its petition without delay.

Sincerely,

Thomas Biddix

Attachment (diagram)

<sup>&</sup>lt;sup>3</sup> See 47 C.F.R. § 54.101(a)(7).

<sup>&</sup>lt;sup>4</sup> Telecommunications Carriers Eligible for Universal Service Support, Virgin Mobile USA, L.P., Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama, et al., Order, DA 10-2433 (rel. Dec. 29, 2010) ("Virgin Mobile ETC Order") at ¶¶ 15-16.

